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September 30, 2024

BY ECF

The Honorable Norman K. Moon
United States District Judge
Western District of Virginia
P.O. Box 657
Lynchburg, VA 24505

Re: Sines, et al. v. Kessler, et al., 3:17 Civ. 72 (NKM) (W.D. Va.)

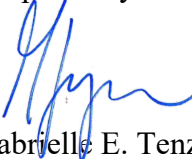
Dear Judge Moon:

In accordance with the Court's September 16, 2024 order, *see* ECF 1686, Plaintiffs Elizabeth Sines, Seth Wispelwey, April Muñiz, Marcus Martin, Natalie Romero, Chelsea Alvarado, Devin Willis, and Thomas Baker submit the attached proposed amended judgment.

We requested Defendants' positions on the proposed amended judgment by sending a copy, along with a copy of the Court's September 16, 2024 order, by USPS Priority Mail Express and email to all Defendants and their counsel, if any, on Wednesday, September 25, 2024. We used the same physical addresses and email addresses as are listed in the certificate of service for this filing. We requested any feedback by Sunday, September 29, 2024 at 5:00 p.m. (ET). No Defendants responded except Defendant Damigo, who (through counsel) consented to the proposed amended judgment and reserved his rights relative to the judgment in bankruptcy court.

We separately bring to the Court's attention the recent passing of Plaintiff Marissa Blair. Sadly, Ms. Blair passed away on Thursday, September 19, 2024. While we are not yet aware of the identity of any successor to (or representative for) Ms. Blair, we anticipate that a successor or representative will move to substitute in the coming weeks. *See* Fed. R. Civ. P. 25(a)(1).

Respectfully submitted,



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